



**Insurance Ireland's Response to the Public consultation of the Department of Enterprise, Trade and Employment on the Corporate Sustainability Reporting Directive**

**9 March 2023**

Insurance Ireland represent companies operating in the Irish market and internationally, making Insurance Ireland a strong leadership voice for the sector. Insurance Ireland members provide competitive and sustainable products and services to customers and businesses across the Life and Pensions, General, Health, Reinsurance and Captive sectors in Ireland and across the globe. In Ireland, our members pay more than €13bn in claims annually and safeguard the financial future of customers through €112.3bn of life and pensions savings.

Our members contribute €1.6bn annually to the Irish Exchequer and the sector employs 28,000 people in high skilled careers. The role of Insurance Ireland is to advocate on behalf of our members with policymakers and regulators in Ireland, Europe and Internationally; to promote the value that our members create for individuals, the economy and wider society; and to help customers understand insurance products and services so that they can make informed choices. Insurance Ireland represents over 130 member firms serving 25m customers in Ireland and globally across 110 countries, including 24 EU Member States, providing protection peace of mind to individuals, households, and businesses, and providing a firm foundation for the success of the Irish economy and wider society.

**General comments**

Insurance Ireland welcomes the opportunity to provide feedback to the public consultation launched by the Department of Enterprise, Trade and Employment ('Department') on the transposition of the Corporate Sustainability Reporting Directive (CSRD) into Irish law.

Insurance Ireland and its members are committed to assisting the transition to a more sustainable economy and a sustainable financial system, as well as to addressing and managing the climate change risks as a matter of urgency.

We support the key objectives of the CSRD which are to improve transparency and disclosures about firms' sustainability activities and how environmental, social and governance risks and opportunities are integrated in firms' business models and strategies.

In order to make sound investment decisions, comply with ever increasing sustainability regulation and advance the ambitious goals of the European Union's Green Deal, it is key for the insurance industry to have access to consistent, reliable and comparable sustainability data which will be hopefully achieved as a result of the CSRD requirements and implementation.

As the Directive extends the scope of companies which will be covered by the sustainability reporting obligations, we believe that the transposition of the CSRD into Irish law should be completed in a timely manner and in advance of the required deadline to ensure firms have sufficient time to prepare for its implementation and compliance obligations.

There are a number of differing regulatory approaches to the topic of sustainability which may include additional reporting, for example that which is currently under debate at the Central Bank of Ireland. It is vital that firms are not overburdened with regulatory obligations and that requirements are pragmatic and deliver on the objectives of the Directive. We suggest that the Department should remain involved in other discussion on the topic, to ensure alignment on legislative requirements in this area.

Linked to this point, we would like to draw the attention of the Department to the fact that the requirements of the Directive is likely to have a substantial effect on third-country insurance groups (of which many are present in Ireland).

For instance, in practical terms this would mean that EU large companies with non-EU parents would have to report consolidated sustainability information on a subsidiary-by-subsidiary basis if equivalence with the non-EU country's sustainability reporting requirements is not determined. This could have potentially significant implications for non-EU parent entities with significant subsidiary operations in the EU, not just in relation to the required resources and compliance burden of increased reporting costs across multiple entities, but also the compliance challenge and related risks of ensuring relevance, accuracy and consistency across multiple reports.

Although we understand that specific rules for third countries and equivalence have yet to be developed given the delayed application of the Directive to them, we are of the opinion that it is important to convey this point to the Department now in the context of the current consultation.

We hope that the above points would be taken into consideration in the process of the CSRD transposition into Irish law.

\*\*\*

*The Insurance Ireland's comments in relation to the Member States' options are included in Appendix I below.*

## Appendix I

**Consultation by the Department of Enterprise, Trade and Employment on Member State Options under the Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability Reporting**

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
<b>Article 1 – Amendments to Directive 2013/34/EU the Accounting Directive</b>		
<b>Article 1 Scope (Amended)</b> <i>New point 3 last subparagraph (New)</i>		
<p>Member States <u>may</u> choose not to apply the coordination measures referred to in the first subparagraph of this paragraph to the undertakings listed in points (2) to (23) of Article 2(5) of Directive 2013/36/EU of the European Parliament and of the Council.</p>	<p>The new requirements for sustainability reporting under the directive apply to large companies and large public-interest entities and listed SMEs.</p> <p>This option allows Member States to exclude certain undertakings on a case-by-case basis. The list of undertakings relevant to Ireland’s transposition in Article 2<sup>1</sup> are</p>	<p><b>II comment:</b></p> <p>We are of the opinion that the Department should include the Central Bank of Ireland in scope. This supports the Regulator taking a leadership role in this area and sets a positive example by demonstrating commitment to the objectives of the CSRD. It will also inform the policymaking of the Regulator in this area.</p> <p>***</p>

---

<sup>1</sup> [EUR-Lex - 02013L0036-20220101 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2013/537/oj)

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
	central banks; post office institutions; the Strategic Banking Corporation of Ireland, credit unions and friendly societies.	
<b>Article 19a – Sustainability Reporting (New)</b> <i>Point 3 last subparagraph (New)</i>		
<p>Member States <u>may</u> allow information relating to impending developments or matters in the course of negotiation to be omitted in exceptional cases where, in the duly justified opinion of the members of the administrative, management and supervisory bodies, acting within the competences assigned to them by national law and having collective responsibility for that opinion, the disclosure of such information would be seriously prejudicial to the commercial position of the undertaking,</p>	<p>The new Article 19a on Sustainability Reporting replaces the existing Article 19a. Article 19a sets out substantially enhanced requirements for sustainability reporting by undertakings in scope of the Directive. The information to be reported should be clearly identifiable within the undertaking’s management report (ie the directors’ report). This option allows Member States to permit undertakings to exclude commercially sensitive information from the sustainability reporting under</p>	<p><b>II comment:</b></p> <p>We are of the opinion that Ireland should exercise this option thus allowing undertakings to exclude commercially sensitive information from the sustainability reporting under specific circumstances.</p> <p>***</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
provided that such omission does not prevent a fair and balanced understanding of the undertaking's development, performance and position, and the impact of its activity.	certain circumstances.	
<i>Point 9 subparagraph three (New)</i>		
The Member State by whose national law the exempted subsidiary undertaking is governed <u>may</u> require that the consolidated management report or, where applicable, the consolidated sustainability report, of the parent undertaking is published in a language that that Member State accepts, and that any necessary translation into such language is provided. Any translation that has not been certified shall include a statement to that effect.	Point 9 sets out exemptions from sustainability reporting for subsidiary undertakings where a parent in the EU includes information on the subsidiary in the consolidated management report drawn up under Article 29 and 29a or, if the parent is in a third country equivalent consolidated sustainability report. Member States have the option to require that the consolidated management/sustainability report is published in an accepted language.	<p><b>II comment:</b></p> <p>We support the exercise of this option which will require the consolidated management/sustainability report to be published in an accepted language.</p> <p>***</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
<b>Article 29a. – Consolidated Sustainability Reporting (New)</b> <i>Point 3 last subparagraph (New)</i>		
<p>Member States <u>may</u> allow information relating to impending developments or matters in the course of negotiation to be omitted in exceptional cases where, in the duly justified opinion of the members of the administrative, management and supervisory bodies, acting within the competences assigned to them by national law and having collective responsibility for that opinion, the disclosure of such information would be seriously prejudicial to the commercial position of the group, provided that such omission does not prevent a fair and balanced understanding of the group's</p>	<p>The new Article 29a on Consolidated Sustainability Reporting replaces the existing Article 29a. Article 29a, similar to Article 19a, sets out substantially enhanced requirements for consolidated sustainability reporting by undertakings in scope of the Directive. The information to be reported should be clearly identifiable within the group management (directors) report. This option allows Member States to permit undertakings to exclude commercially sensitive information from the sustainability reporting under certain circumstances.</p>	<p><b>II comment:</b>  We have no objections to this.</p> <p>***</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
development, performance, and position, and the impact of its activity.		
<i>Point 8 subparagraph (New)</i>		
<p>The Member State by whose national law the exempted parent undertaking is governed <u>may</u> require that the consolidated management report or, where applicable, the consolidated sustainability report of the parent undertaking is published in a language that that Member State accepts, and that any necessary translation into such language is provided. Any translation that has not been certified shall include a statement to that effect.</p>	<p>As in Article 19a, Member States have the option to require that the consolidated management/sustainability report is published in an accepted language.</p>	<p><b>II comment:</b>  We support the exercise of this option which will require the consolidated management/sustainability report to be published in an accepted language.</p> <p>***</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
<b>Article 30 General Publication (Amended)</b>		
<i>Point 1 subparagraph 2 (New)</i>		
<p>Member States <u>may</u> require undertakings subject to Articles 19a and 29a to make the management report available to the public on their website, free of charge. Where an undertaking does not have a website, Member States <u>may</u> require it to make a written copy of its management report available upon request.</p>	<p>Article 30 of the Accounting Directive sets out the publication requirements for annual financial statements and management reports (i.e. the directors' report). As a general rule, the management report must be filed with the Companies Registration Office.</p> <p>This option allows Member States to require undertakings in scope of the requirements for sustainability reporting to publish the management report on their website or make a copy available upon request.</p>	<p><b>II comment:</b></p> <p>While we have no objections in principle with this option, with a view to improving transparency, there are a number of firms who do not have websites on which to publish the report. It is a positive to see that there is an alternative option, and again being mindful of regulatory burden we suggest that further work is needed on this to establish whether exemptions to this option should be made available.</p> <p>***</p>
<i>Point 1 subparagraph 4 (Existing)</i>		
<p>Member States <u>may</u>, however</p>	<p>As stated above as a general</p>	<p><b>II comment:</b></p>



Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
<p>exempt undertakings from the obligation to publish the management report where a copy of all or part of any such report can be easily obtained upon request at a price not exceeding its administrative cost.</p>	<p>rule, the management report must be filed with the Companies Registration Office. Member States may exempt undertakings from this requirement provided the report can be readily obtained from the undertaking at a price not exceeding its administrative cost.</p> <p>This option is not new and was not taken in the transposition of Directive 2013/34/EU but it is repeated here for completeness.</p>	<p>We have no objections to this, subject to further work on understanding the different firms and taking a proportionate approach to the requirement.</p> <p>***</p>
<p><b>Article 34.3 General Requirement Auditing (Amended)</b>  <i>Point 3 (New)</i></p>		
<p>Member States <u>may</u> allow a statutory auditor or an audit firm other than the one(s)</p>	<p>Article 34 of the Accounting Directive sets out the general requirement for the statutory</p>	<p><b>II comment:</b>  We believe that the exercise of this option will allow the opinion referred to in point (aa) of the second</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
<p>carrying out the statutory audit of financial statements to express the opinion referred to in point (aa) of the second subparagraph of paragraph 1.</p> <p>(i.e. the opinion on the compliance with sustainability reporting)</p>	<p>audit of financial statements of undertakings. It is amended to provide for the assurance (audit) of sustainability reporting by undertakings.</p> <p>This option allows Member States to permit undertakings to engage separate statutory auditors/audit firms to carry out the statutory audit of financial statements and the assurance of the sustainability reporting.</p>	<p>subparagraph of paragraph 1 to be provided by auditors who have the expertise and competencies in the area of sustainability reporting assurance.</p> <p>However, it should be noted that under existing legislation a number of types of firms are exempt from completing statutory audits and may not be completing a statutory audit at all. This should be considered when legislating for firms to complete an audit in this area.</p> <p>***</p>
<i>Points 4 and 5 Independent Assurance Services Provider (New)</i>		
<p>Member States <u>may</u> allow an independent assurance services provider established in their territory to express the opinion referred to in point (aa) of the second subparagraph of paragraph 1, provided that such</p>	<p>This option allows Member States to introduce a new category of Independent Assurance Services Provider (IASP) to provide for the assurance of sustainability reporting by undertakings. IASPs must be subject to equivalent requirements to statutory</p>	<p><b>II comment:</b></p> <p>We do not object to this option.</p> <p>***</p>

<b>Member State Option</b>	<b>Background Information</b>	<b>Do you consider that Ireland should exercise this option? Please provide reasons for your answer.</b>
<p>independent assurance services provider is subject to requirements that are equivalent to those set out in Directive 2006/43/EC of the European Parliament and of the Council as regards the assurance of sustainability reporting as defined in point 22 of Article 2 of that Directive, in particular the requirements on:</p> <p>(a) training and examination, ensuring that independent assurance services providers acquire the necessary expertise concerning sustainability reporting and the assurance of sustainability reporting;</p> <p>(b) continuing education;</p> <p>(c) quality assurance systems;</p>	<p>auditors in respect of this assurance work including in respect of training, education, quality assurance and investigations and sanctions. In due course Member States that exercise the option to introduce IASPs must also exercise the option to permit separate statutory auditors/audit firms to carry out the audit of financial statements and assurance of sustainability reporting. Member states that exercise the option to introduce IASPs must also in due course provide for home/host model of oversight of IASPs with other Member States.</p>	

<b>Member State Option</b>	<b>Background Information</b>	<b>Do you consider that Ireland should exercise this option? Please provide reasons for your answer.</b>
<p>(d) professional ethics, independence, objectivity, confidentiality and professional secrecy;</p> <p>(e) appointment and dismissal;</p> <p>(f) investigations and sanctions;</p> <p>(g) the organisation of the work of the independent assurance services provider, in particular in terms of sufficient resources and personnel and the maintenance of client account records and files; and</p> <p>(h) reporting irregularities.</p> <p>Member States shall ensure that, where an independent assurance services provider</p>		

<b>Member State Option</b>	<b>Background Information</b>	<b>Do you consider that Ireland should exercise this option? Please provide reasons for your answer.</b>
<p>expresses the opinion referred to in point (aa) of the second subparagraph of paragraph 1 of this Article, that opinion is prepared in accordance with Articles 26a, 27a and 28a of Directive 2006/43/EC and that, where applicable, the audit committee, or a dedicated committee, reviews and monitors the independence of the independent assurance services provider in accordance with point (e) of Article 39(6) of Directive 2006/43/EC.</p> <p>Member States shall ensure that independent assurance services providers accredited before 1 January 2024 for the assurance of sustainability reporting, in accordance with Regulation (EC) No 765/2008,</p>		

<b>Member State Option</b>	<b>Background Information</b>	<b>Do you consider that Ireland should exercise this option? Please provide reasons for your answer.</b>
<p>are not subject to the training and examination requirements referred to in point (a) of the first subparagraph of this paragraph.</p> <p>Member States shall ensure that independent assurance services providers that on 1 January 2024 are undergoing the accreditation process in accordance with the relevant national requirements are not subject to the training and examination requirements referred to in point (a) of the first subparagraph as regards the assurance of sustainability reporting, provided they complete that process by 1 January 2026.</p> <p>Member States shall ensure</p>		

<b>Member State Option</b>	<b>Background Information</b>	<b>Do you consider that Ireland should exercise this option? Please provide reasons for your answer.</b>
<p>that the independent assurance services providers referred to in the third and fourth subparagraphs acquire the necessary knowledge in sustainability reporting and the assurance of sustainability reporting via the continuing education requirement referred to in point (b) of the first subparagraph.</p> <p>If a Member State, pursuant to the first subparagraph, decides to allow an independent assurance services provider to express the opinion referred to in point (aa) of the second subparagraph of paragraph 1, it shall also allow a statutory auditor other than the one(s) carrying out the statutory audit of financial statements to do</p>		

<b>Member State Option</b>	<b>Background Information</b>	<b>Do you consider that Ireland should exercise this option? Please provide reasons for your answer.</b>
<p>so, as provided for in paragraph 3.</p> <p>5. From 6 January 2027, a Member State that has made use of the option provided for in paragraph 4 (the “host Member State”) shall allow independent assurance services provider established in a Member State other than the host Member State (the “home Member State”) to carry out the assurance of sustainability reporting.</p> <p>The home Member State shall be responsible for the supervision of the independent assurance services providers established in its territory, unless the host Member State decides to supervise the assurance of sustainability</p>		



<b>Member State Option</b>	<b>Background Information</b>	<b>Do you consider that Ireland should exercise this option? Please provide reasons for your answer.</b>
<p>reporting carried out by independent assurance services providers in its territory.</p> <p>If the host Member State decides to supervise the assurance of sustainability reporting carried out in its territory by independent assurance services providers registered in another Member State, the host Member State shall:</p> <p>(a) not impose more stringent requirements or liability on such independent assurance services providers than those required for assurance of sustainability reporting by the national laws for the independent assurance</p>		

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
<p>services providers or auditors established in that host Member State; and</p> <p>(b) inform other Member States about its decision to supervise the assurance of sustainability reporting carried out by independent assurance services providers established in other Member States.</p>		
<p><b>Article 40a Sustainability Reports concerning third-country undertakings (New)</b>  <i>Point 1 last subparagraph (new)</i></p>		
<p>Member States <u>may</u> require subsidiary undertakings or branches referred to in the first and third subparagraphs to send them information about the net turnover generated in their territory and in the Union by the third-country undertakings.</p>	<p>This is a new Article 40a inserted into the Accounting Directive on sustainability reports concerning third country undertakings. This option underpins the requirement for sustainability reports by large subsidiaries and branches operating in the EU (turnover &gt; €40 million) of non-</p>	<p><b>II comment:</b>  We believe that further work needs to be completed on this option before concluding.</p> <p>***</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
	EU companies (turnover in the EU > €150 million). It permits Member States to require subsidiary undertakings and branches to send information about net turnover generated in the Member State and in the EU.	
<b>Article 3 Amendments to Directive 2006/43/EC the Audit Directive</b>		
<b>Article 12 Combination of practical training and theoretical instruction (replaced)</b> <i>Point 1 (existing)</i>		
1. Member States <u>may</u> provide that periods of theoretical instruction in the subjects referred to in Article 8(1) and (2) shall count towards the periods of professional activity referred to in Article 11, provided that such instruction is attested by an examination recognised by the Member State. Such instruction shall not last less	This Article and option allows Member States to permit that periods of study can count towards professional activity periods required in Article 11 which governs qualifications through long term practical experience of statutory auditors. There is no substantive change to this option and it is not concerned with sustainability reporting but it is amended to	<p><b>II comment:</b></p> <p>We support the exercise of this option. Insurance Ireland has long called for the CBI to award CPD points in the study of sustainability. It is an important topic and the ability to maximise time spent learning on it should be facilitated.</p> <p>***</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
<p>than one year, nor may it reduce the period of professional activity by more than four years.</p> <p>2. The period of professional activity and practical training shall not be shorter than the course of theoretical instruction together with the practical training required under the first subparagraph of Article 10(1).’;</p>	<p>take account of new cross-references in Article 8 arising from the amending Directive. It was not exercised in the transpositions of Directive 2006/43/EC and Directive 2014/56/EU however it is repeated here for completeness.</p>	
<p><b>Article 26a Assurance Standards for sustainability reporting (New)</b>  <i>Point 2 (New)</i></p>		
<p>2. Member States <u>may</u> apply national assurance standards, procedures or requirements as long as the Commission has not adopted an assurance standard covering the same subject matter.</p>	<p>Article 26a is a new article inserted into the Audit Directive which sets out the requirement for the audit of sustainability reporting to be done in accordance with assurance standards which will be developed by the EU Commission.</p>	<p><b>II comment:</b>  While this is logical, it may in fact result in an unlevel playing field across the EU if Member States have differing approaches. We suggest further discussion is needed on this.</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
<p>Member States shall communicate the national assurance standards, procedures or requirements to the Commission at least three months before their entry into force.</p>	<p>This option permits Member States to apply national standards in the event that the Commission has not adopted a standard on the same subject matter.</p>	
<p><b>Article 28a Assurance Report on sustainability reporting (New)</b>  <i>Point 5 (New)</i></p>		
<p>5. Member States <u>may</u> require that, where the same statutory auditor carries out the statutory audit of annual financial statements and the assurance of sustainability reporting, the assurance report on sustainability reporting may be included as a separate section of the audit report.</p>	<p>Article 28a is a new article inserted into the Audit Directive which sets out the requirements for the assurance report by statutory auditors/audit firms of sustainability reporting to be done in accordance with assurance standards which will be developed by the EU Commission (or any national standard if relevant).</p> <p>This option permits Member States to provide that where the</p>	<p><b>II comment:</b></p> <p>We support the exercise of this option as it would contribute to better clarity and delineation between the statutory audit of annual financial statements and the assurance of sustainability reporting and as long as it would not incur additional and disproportionate costs for the undertakings in scope of the Directive.</p> <p>However, according with our response earlier, consideration should be given for firms who are availing of the audit exemption under the current legislation and how this would work with the audit requirements under the CSRD transposition.</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
	same statutory auditor/audit firm carries out the statutory audit of the financial statements and the assurance of sustainability reporting, the assurance report may be included as a separate section of the audit report.	***
<p><b>Article 29 Quality Assurance Systems (Amendment)</b></p> <p><i>Point 2a (New)</i></p>		
<p>2a. Member States <u>may</u> exempt, until 31 December 2025, persons who carry out quality assurance reviews relating to the assurance of sustainability reporting from the requirement to have relevant experience in sustainability reporting and in the assurance of sustainability reporting or in other sustainability-related services.’;</p>	<p>The amendments to Article 29, which governs quality assurance systems for statutory audit, allow where applicable for quality assurance of sustainability reporting.</p> <p>This option permits Member States to allow for a transition period for persons carrying out quality assurance reviews on sustainability reporting by exempting them until the end of</p>	<p><b>II comment:</b></p> <p>We support the exercise of this option. However, it is important that those carrying out quality assurance reviews on sustainability reporting are required to have completed relevant training in advance, so that they have the requisite skills (given they will not have the relevant lived experience).</p> <p>***</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
	2025 from the requirement to have relevant experience in sustainability reporting or the assurance of same.	
<b>Article 30 Systems of Investigations and Sanctions (Amended)</b> <i>Point 2 second subparagraph (existing)</i>		
<p>Member States <u>may</u> decide not to lay down rules for administrative sanctions for infringements which are already subject to national criminal law. In that event, they shall communicate to the Commission the relevant criminal law provisions.’;</p>	<p>The amendments to Article 30, which governs systems of investigations and sanctions for breaches of statutory audit rules, allow for the extension of investigation and sanctions systems to assurance of sustainability reporting.</p> <p>This option is not amended directly and allows Member States not to provide for an administrative sanction regime where criminal law already</p>	<p><b>II comment:</b> We support the exercise of this option.</p> <p>***</p>

Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
	applies. It was not exercised in the transposition of Directive 2014/56/EU.	
<b>Article 39 Audit Committee (Amended)</b> <i>Paragraph 4a (New)</i>		
<p>Member States <u>may</u> allow the functions assigned to the audit committee relating to sustainability reporting and relating to the assurance of sustainability reporting to be performed by the administrative or supervisory body as a whole or by a dedicated body established by the administrative or supervisory body.</p>	<p>The amendments to Article 39, which governs the rules for Audit Committees of public interest entities, allow for the extension of certain audit committee functions to include assurance of sustainability reporting. This option permits Member States to allow these functions to be assigned to the board of directors of the public-interest for example or another dedicated body established by the public interest entity. It is similar to an option at Article 39(4) which applies to statutory audit. This option was not exercised in the transposition</p>	<p><b>II comment:</b>  We would like to note Section 1551 of the Companies Act 2014 (as inserted by the Companies (Statutory Audits) Act 2018) which provides an exemption for captive insurers to establish an Audit Committee. This exemption exists where, inter alia, a body performs equivalent functions to an audit committee. Some of our members therefore would not have an audit committee and again this should be considered.</p> <p>***</p>



Member State Option	Background Information	Do you consider that Ireland should exercise this option? Please provide reasons for your answer.
	of Directive 2014/56/EU.	

Please provide any further views you have in relation to the transposition and development of future policy in this area.

e.g Scope and Phasing, Assurance (Audit), Oversight and Sanctions.

**II comment:**

As noted in our *General comments* above, we believe that the transposition of the CSRD into Irish law should be completed in a timely manner and in advance of the required deadline to ensure firms have sufficient time to prepare for its implementation and compliance obligations. Consideration also needs to be given to an aligned approach, particularly for regulated firms, who are bound by overlapping regulation and legislation already.

We would also like to reiterate our concern that the requirements of the Directive would have a substantial effect on third-country insurance groups and we are of the opinion that the Department should be cognizant of those impacts.

**ENDS**